

**FILED**  
 UNITED STATES DISTRICT COURT  
 ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

MAR 7 2023

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS  
 CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**LEROY SEGURA ROMERO,**

Defendant.

CRIMINAL NO. 23-269 KWR

Count 1: 18 U.S.C. §§ 922(a)(6) and 924:  
 False and Fictitious Statements to a  
 Federally Licensed Firearm Dealer.

INDICTMENT

The Grand Jury charges:

Count 1

On or about May 25, 2022, in Bernalillo County, in the District of New Mexico, the defendant, **LEROY SEGURA ROMERO**, in connection with the acquisition of a firearm, that is, an Ohio Ordnance Works, Inc. M240-SLR 7.62x51 Rifle, bearing serial number 240732, from the BMC Tactical Store in Albuquerque, New Mexico, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to BMC Tactical, which was intended and likely to deceive BMC Tactical as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that that **LEROY SEGURA ROMERO** provided an address wherein he did not live.

In violation of 18 U.S.C. §§ 922(a)(6) and 924.

FORFEITURE ALLEGATION

Upon conviction of any offense in violation of 18 U.S.C. § 922(a)(6), the defendants, **LEROY SEGURA ROMERO**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. an Ohio Ordnance Works, Inc. M240-SLR 7.62x51 Rifle, bearing serial number 240732.

A TRUE BILL:

/s/  
FOREPERSON OF THE GRAND JURY



Assistant United States Attorney